

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No.: 1:21 CR 298
	:	
LILIAN MANTSEVA BARKOVSKAJA	:	
a.k.a. Lilian Raymond Odierno	:	

MOTION TO CONTINUE

NOW COMES the Defendant, Lilian Mantseva Barkovskaja, by and through the undersigned counsel, and moves the Court to continue the trial of this matter from its November 2021 Criminal Term and to reset the deadline for pre-trial Motions and other deadlines previously set forth in the Court's September 2021 Scheduling Order filed on September 10, 2021. In support of this Motion, the Defendant shows the Court as follows:

1. The undersigned attorney was appointed to represent Defendant on August 2, 2021. The Defendant's Arraignment was held on September 22, 2021.
2. Defendant is charged with fraud and misuse of visas and aggravated identity theft.
3. The time for filing defensive motions in the case is Monday, October 18, 2021.
4. Due to technical difficulties, the U.S. Attorney's Office has been delayed in uploading the discovery to USAfx. The U.S. Attorney's Office started uploading the discovery this morning.
5. The undersigned counsel has been informed that the discovery is lengthy. In addition, the Defendant and potential witnesses speak Spanish and the Defendant's mother

speaks Russian. Undersigned counsel needs to have sufficient time to investigate the case with the use of interpreters and speaking with witnesses and translating discovery.

6. The undersigned attorney has consulted with the Assistant United States Attorney assigned to the case, Frank J. Chut, regarding an extension of time, and he has no objection to enlarging the time to file pre-trial motions.

7. Defendant, through counsel, waives any running of the speedy trial statute during the requested extension of time.

NOW THEREFORE, for the reasons set forth herein, the Defendant, Lilian Mantseva Barkovskaja, moves the Court to continue this matter from its November, 2021 Criminal Term to the next regularly scheduled Term. The Defendant also moves the Court to reset its deadline concerning pre-trial motions, plea agreements, plea changes, and trial date to times appropriate for the next term.

Respectfully submitted this the 15th day of October, 2021.

/s/ Robert W. Ewing
Robert W. Ewing, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and have verified that such filing was sent electronically using the CM/ECF system to notify Assistant United States Attorney Frank J. Chut.

/s/ Robert W. Ewing

Robert W. Ewing, Esq.

Attorney for Defendant

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